

Fwd: SUPPLEMENTAL DISCOVERY RESPONSES

From: malik shabazz (litigation.shabazz@yahoo.com)

To: attorney.shabazz@yahoo.com

Date: Thursday, March 27, 2025 at 10:45 PM GMT-4

Malik Z. Shabazz, Esq.
(301) 513-5445
(240) 688-0735
700 Pennsylvania Ave SE
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Washington D.C.
20003

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Begin forwarded message:

From: Jason Dare <jdare@bislawyers.com>
Date: March 26, 2025 at 6:21:43 PM EDT
To: malik shabazz <litigation.shabazz@yahoo.com>
Cc: trent Walker <trent@trentwalker.esq.com>
Subject: RE: SUPPLEMENTAL DISCOVERY RESPONSES

Malik:

1. From my recollection, the documents produced to DOJ are bates numbered RC 2074 through RC 4346.
2. I agreed to determine whether Rankin County **could** obtain Dedmon's cell records at issue. That is being looked into.
3. I agreed to supplement with the TASER logs once you provided me with the names and dates, and I intend to keep my word to the extent there are records to produce. I'll need to obtain these records first.

While on the subject of agreements, you agreed in November of 2024 to provide documents in response to RFP #11 and #13, namely:

REQUEST NO. 11: Produce color copies of all social media posts and/or videos by you (including your agents, representatives, and/or attorneys) concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: Copies of request shall be produced and are forthcoming.

REQUEST NO. 13: Produce any and all e-mails, text messages, documents, or things of any kind that relate in any way to communications by and between you (including your agents, representatives, and/or attorneys) and any person with any form of news media concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: Objection. Such documents are protected by attorney-client privilege. Notwithstanding such assertions of privilege, such documents nor protected by privilege shall be produced.

None of these have been produced as of today.

4. For everything else, I must maintain that discovery concluded on March 3, 2025, and would invoke L.U. Civ. R. 7(b)(2)(C).

Jason E. Dare

C: (601) 573-7580 **D:** (601) 987-5307

E: jdare@bislawyers.com

From: malik shabazz <litigation.shabazz@yahoo.com>

Sent: Wednesday, March 26, 2025 2:47 PM

To: Jason Dare <jdare@bislawyers.com>

Cc: trent Walker <trent@trentwalkeresq.com>

Subject: SUPPLEMENTAL DISCOVERY RESPONSES

Hello Jason:

In regards to supplement discovery responses, are you going to provide any of the material that were agreed on in last weeks call with the Judge?

I recollect:

1. Bates numbered responses to the DOJ questions.
2. Christian Dedmon's cell phone logs and texts.
3. Specific taser logs for persons identified in RPD #3 (we identified the date and the specific officers involved for these persons on Friday 3/21/25).
4. A response to RPD 15-21.

Can you let us know today whether we can expect any responses in these discovery issues?

Sincerely,

Malik Z. Shabazz, Esq.

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Begin forwarded message:

From: malik shabazz <litigation.shabazz@yahoo.com>

Date: March 24, 2025 at 9:00:36 PM EDT

To: Jason Dare <jdare@bislawyers.com>

Cc: Kathy Aldridge <kaldridge@bislawyers.com>, trent Walker
<trent@trentwalkeresq.com>

**Subject: Re: REQUEST FOR EXTENSION/ SUPPLEMENTAL
DISCOVERY RESPONSES**

Hey Jason:

Are you available Tuesday 12 noon to review these discovery issues?

Sincerely

Malik Z. Shabazz, Esq.

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On Mar 21, 2025, at 9:52 PM, malik shabazz
<litigation.shabazz@yahoo.com> wrote:

Hello Jason:

1 The plaintiffs are requesting your consent to an extension until 4/14/25 to respond to your summary judgment motion filed on 3/17/25. Amongst other matters of good cause, I have an appeal brief due in the Court of Appeals in Maryland on 3/31/25.

Will you consent to our request for an extension?

2. Attached. is plaintiff's remaining list of discovery issues with defense. I am available anytime Monday or Tuesday to confer on these matters.

Sincerely,

Malik Z. Shabazz Esq.
700 Pennsylvania Ave
Suite 200
Washington, DC 20003
attorney.shabazz@yahoo.com
Ph: 301-513-5445
Fax: 301-513-5447

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